

REMARKS

Claims 1-12 are withdrawn. Claims 13-20 are canceled. Claims 21-26 have been added and are pending examination. In the final Office Action mailed on 29MAY07, claims 1, 2, and 4 were rejected under 35 U.S.C. §102(b) as being anticipated by US 3,045,264 to Seibert (hereinafter "Seibert"). Applicants hereby traverse these claim rejections because Seibert has no teaching whatsoever of stamping die roll. For example, Seibert's teachings do not include or leverage any stamping die roll to save the cost of rounding any edges.

Die roll is structurally distinct from the round cross sectional profile taught by Seibert. That is, one of ordinary skill in the art can readily identify die roll based on the edge structure and appearance, without prior knowledge of the manufacturing process. This is not a situation where the same structure might be prepared by a different process. Therefore, the examiner is not free to interpret the die roll limitation as a mere product-by-process limitation. On the contrary, the "die roll" limitation must also be treated as a structural limitation, and therefore cannot be ignored by the examiner or satisfied by a non-die-roll cross-sectional profile in the prior art.

It is not proper to base claim rejections on an interpretation of words that has been broadened to the point where the words no longer hold their plain meaning. Stamping "die roll" has a distinct structural meaning to those of ordinary skill in the art. At least because Seibert does not disclose stamping "die roll", Seibert cannot anticipate claims 1,2, and 4. Therefore Applicants respectfully request that the rejections of claims 1, 2 and 4 be withdrawn.

In the non-final Office Action mailed on 04JAN07, claims 1, 3, 5 and 6 were rejected under 35 U.S.C. §103(a) as being obvious over US 5,383,938 to Rohr (hereinafter "Rohr") in view of US 4,343,581 to Millheiser (hereinafter "Millheiser"). Applicants hereby traverse these claim rejections.

Rohr teaches a locking ring with a chamfer bordering one face of the locking ring. The purpose of the chamfer disclosed by Rohr is "ease of assembly". See Rohr, col. 1, lines 55-60. The chamfer in Rohr functions to facilitate assembly by spreading when pressed. See Rohr, col. 1, lines 34-37. To provide this function and serve Rohr's

purpose, the chamfer on edges 33, 34 has a maximum depth at the minimum width as shown in Fig. 4. *See* Rohr, col. 1, lines 55-60. *See also* Rohr col. 3 lines 32-33. It is clear from Fig. 4 of Rohr that a double chamfer (i.e. one chamfer bordering each opposing face of the locking ring as taught by Millheiser) would be incompatible with the structure, function, and purpose of the chamfer in Rohr. That is, it is clear that the function and purpose of the chamfer in Rohr as cited above and shown in Fig. 4, would be frustrated by a combination with the double bevel teachings of Millheiser. Notwithstanding the examiner's that Applicant "fails to provide any support" for this conclusion, Applicant has, in fact, provided ample support for the conclusion, as follows:

Millheiser teaches a novel double-bevel retaining ring design that purportedly solves the problems associated with earlier double-bevel retaining rings, by (1) matching bevel angle with groove wall angle to eliminate end-play and (2) ensuring that the bevel on one face of the ring is the same as the bevel on the other face to eliminate the potential of backwards insertion during assembly. *See, e.g.* Millheiser Fig. 7. Clearly, this teaching is incompatible with the teaching of Rohr, because, as shown in Rohr Fig. 4, Rohr depends upon the absence of a matching bevel on the ring's second face, to facilitate a deep bevel on the first face for ease of assembly (as shown in Rohr Fig. 4). Thus, there would be no motivation to modify the Rohr reference to have a double bevel according to Millheiser that would frustrate the intended operation of the invention disclosed in the Rohr reference. For at least this reason, the combination of Rohr and Millheiser cannot support a proper *prima facie* case of obviousness of claims 1, 3, 5 and 6. Applicants therefore request that the rejection of claims 1, 3, 5 and 6 under 35 U.S.C. §103(a) be withdrawn.

In the non-final Office Action mailed on 04JAN07, claims 7, 8, and 10 were rejected under 35 U.S.C. §103(a) as being obvious over US 6,856,485 to Toh (hereinafter "Toh") in view of Seibert. Applicant's traversal of these claim rejections survives the examiner's response in the final office action because, even assuming *arguendo* (and counterfactually) that Seibert included disclosure that ring 30 were formed of a wire stock, such a simple use of a wire stock would teach away from the present disclosure (which is explicitly incompatible with the simple use of a wire stock

as a ring because stamping "die roll" is required by all of the presently-pending claims, and "die roll" is not created by the extrusion of wire stock). Applicants therefore request that the rejection of claims 7, 8 and 10 under 35 U.S.C. §103(a) be withdrawn.

In the non-final Office Action mailed on 04JAN07, claims 7, 9, 11, and 12 were rejected under 35 U.S.C. §103(a) as being obvious over Toh in view of Rohr and Millheiser. Applicant's traversal of these claim rejections survives the examiner's response in the final office action in which the examiner tries to equate "an improved connection" with "ease of assembly." The absence in the Rohr reference of any support for "an improved connection" is not thereby cured, because "ease of assembly" is simply a different concept. Again, it is not proper to support claim rejections by broadening the interpretation of words to the point where they no longer hold their plain meaning. Applicants therefore request that the rejection of claims 7, 9, 11, and 12 under 35 U.S.C. §103(a) be withdrawn.

Notwithstanding the impropriety of the aforementioned combinations of references as demonstrated above, all of the aforementioned combinations of references fail to disclose die roll bordering a first face of a snap ring while a bevel borders a second face (as required by pending claims 3, 5, 6, 9, 11, 12). For this additional reason the rejections of claims 3, 5, 6, 9, 11, 12 should be withdrawn.

New method claims 21-26 are patentable over the art of record at least because independent claim 21 requires stamping and die roll caused by said stamping on a first interior edge, and forming a blunted cross-sectional profile on an opposite second interior edge. The art of record does not teach such stamping and blunting on the opposite edge from the die roll induced by stamping.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all of the pending claims are now in condition for allowance and request reconsideration of the rejections. If a telephone conversation might expedite the prosecution of the present application, or clarify matters with regard to its allowance, the Examiner is invited to contact the undersigned attorney at the number listed below.

The Commissioner is hereby authorized to charge payment of any required fees associated with this Communication or credit any overpayment to Deposit Account No. 50-4119.

Respectfully submitted,



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